

**AFFIDAVIT**

I, Michael Feagan, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of an application for a complaint charging Franklin Perry, DOB: xx/xx/1966 with selling, exchanging, transferring and delivering counterfeit Federal Reserve Notes with the intent that the same be passed, published or used as true and genuine, in violation of Title 18, United States Code, Section 473.

2. I am a Special Agent with the United States Secret Service, and have been since July 5, 2017. I attended the Criminal Investigator Training Program at the Federal Law Enforcement Training Center in Glynco, GA and the United States Secret Service Special Agent Training Course at the John J. Rowley Training Center in Beltsville, MD. As part of this training, I received intensive instruction in the detection, identification, and classification of counterfeit Federal Reserve Notes through classroom lectures, hands-on training, and practical exercises. I also received training in the location and identification of security features unique to genuine currency. I am a veteran of the United States Army and hold a Bachelor of Science Degree in Criminal Justice from Sam Houston State University.

3. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

**PROBABLE CAUSE**

4. Since April 2018, the USSS Boston Field Office has been conducting an investigation into the source of numerous counterfeit notes passed in the Boston area. These counterfeit notes are manufactured using a process that entails bleaching the ink off genuine \$1 and \$5 Federal Reserve Notes and re-printing counterfeit images of \$100 bills. This process preserves the security features of genuine currency to include red and blue synthetic fibers and watermarks. The resulting notes are unable to be detected by commercially available counterfeit detection pens used widely by retail establishments to identify counterfeit currency. The estimated loss in the Boston area resulting from these notes is in excess of \$300,000. Franklin Perry has been a suspect in this counterfeiting investigation.

5. Since January 2018, a Confidential Human Source (CHS) has been cooperating with law enforcement in which he positively identified numerous individuals involved in drug trafficking, illegal firearm possession, and gang activity. Under the supervision of FBI agents, CHS conducted numerous consensually recorded conversations in person and over the telephone. Under supervision of FBI agents, CHS also made numerous controlled and recorded drug purchases from various target subjects. The information that CHS provided has been corroborated by the controlled drug purchases and by the investigation generally. Law enforcement agents from the FBI and other agencies consider the information provided by CHS to be reliable. CHS has a criminal history containing larceny, uttering, resisting arrest, disorderly conduct, assault, firearms, controlled substance, armed robbery, and murder. CHS has received consideration in the form of financial assistance in connection with his/her cooperation.

6. CHS also has had several arrests and convictions in Massachusetts for counterfeiting and uttering, the most recent in 2016. CHS informed FBI agents that he knew Franklin Perry for approximately 35 years. CHS was a codefendant with Perry in 1987 in Norfolk Superior Court on armed robbery and other charges. CHS told agents that from his interactions with Perry he knew Perry to be involved in the making of selling of counterfeit currency since 2008 and was currently back at it.

7. On June 27, 2018, CHS, working with the FBI, conducted a controlled purchase of \$1,000 in counterfeit \$100 Federal Reserve Notes from Franklin Perry. Prior to the meeting, the CHS made a recorded phone call to Franklin Perry to which I have listened. In the call, Perry directed the CHS to meet him where Perry was living. Perry said the price was 30 cents on the dollar for the counterfeit Federal Reserve Notes.

8. Prior to the meeting between CHS and Perry, FBI agents met with CHS at a predetermined location, searched him and found no hundred dollar bills or contraband in his possession. FBI agents provided CHS with \$300 in agency funds to purchase \$1,000 in suspected counterfeit Federal Reserve Notes from Perry. CHS was outfitted with a video and audio recording device. An FBI agent drove CHS to outside Perry's cousin's residence, which was located at 30 Bullard Street, Dorchester, MA. FBI agents also had a surveillance camera that visually recorded any visible interaction between CHS and Perry.

9. I have reviewed both the surveillance and audio/video recordings of the meeting between CHS and Perry, which occurred on the street outside the residence. In the surveillance video I saw an exchange of currency between CHS and Perry. In the audio recording, Perry

stated he had about “14,” referring to \$100 bills, and CHS asked for “10 of them.” CHS used the \$300 provided by the FBI to purchase \$1,000 in counterfeit currency in the form of ten \$100 bills. CHS also stated that he was waiting on “Giz” to get money, stating, “I need money too.” According to CHS, “Giz” is known to drive Perry to pick up supplies for manufacturing his counterfeit notes, because Perry has a suspended driver’s license and does not have a vehicle. According to the Massachusetts Driver’s License Registry, Perry has a suspended driver’s license and does not own a vehicle.

10. After the meeting with Perry CHS met with FBI agents and provided the ten \$100 bills Perry sold him. FBI agents also searched CHS and found no additional \$100 bills or contraband.

11. In a subsequent recorded telephone call after the purchase, which I have also listened to, Perry told CHS that his hundreds could “pass the machine.” CHS knew this to mean that the counterfeit notes that Perry manufactured could defeat the detection measures commonly used at retail stores.

12. I have examined the ten \$100 notes Perry sold to CHS, and based on my training and experience determined that they are counterfeit. The serial numbers on the counterfeit \$100 bills Perry sold to CHS, KJ30744345A and B02668896A, have an extensive history of appearing on counterfeit bills passed in the Boston area. KJ30744345A has a history dating back to November 2015 with over 150 passes at retail stores, and B02668896A has a history dating back to January 2014 with over 500 passes at retail stores.

13. Accordingly, I believe there is there is probable cause to believe that on or about June 27, 2018 Franklin Perry did sell, exchange, transfer, receive, or deliver a counterfeit Federal Reserve Note with the intent that the same be passed, published or used as true and genuine.

Respectfully submitted,



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Michael Feagan  
Special Agent  
United States Secret Service

Subscribed and sworn to before me  
on August 21, 2018:



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UNITED STATES MAGISTRATE JUDGE

